

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

FACTORY SALES AND ENGINEERING,
INC., d/b/a FSE ENERGY, a Louisiana
corporation,

Plaintiff,

v.

NIPPON PAPER INDUSTRIES USA CO.,
LTD., a Washington corporation,

Defendant.

No. 3:14-cv-05899

**NIPPON PAPER INDUSTRIES USA
CO. LTD.'S RESPONSE TO FSE'S
MOTION TO CONSOLIDATE**

NIPPON PAPER INDUSTRIES USA CO.,
LTD., a Washington corporation,

Counterclaimant,

v.

FACTORY SALES AND ENGINEERING,
INC., d/b/a FSE ENERGY, a Louisiana
corporation,

Counterdefendant/
Third Party Plaintiff,

v.

OPTIMUS INDUSTRIES, L.L.C. d/b/a
CHANUTE MANUFACTURING COMPANY,
a Delaware limited liability company,

Third Party Defendant.

1 Nippon Paper Industries USA Co., Ltd., without waiving any claims or defenses,
2 respectfully requests the same relief sought in Factory Sales and Engineering, Inc.'s Motion to
3 Consolidate (Dkt. No. 36).

4 DATED this 15th day of May, 2015.

5 RIDDELL WILLIAMS P.S.

6
7 By /s/ Blake Marks-Dias

8 James Breitenbucher, WSBA #27670
9 Blake Marks-Dias, WSBA #28169
10 Attorneys for Defendant/Counterclaimaint
11 Nippon Paper Industries USA Co., Ltd.
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CERTIFICATE OF SERVICE

I hereby certify that on the date written below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- Richard M. Stanislaw - milesstanislaw@msn.com
- Diane C. Utz - dutz@wthf.com
- David C. Bransdorfer - dcb@bransdorfer.net
- Bennett J. Hansen – bhansen@pregodonnell.com
- Andrew C. Bohrsen – aborhnsen@comcast.net

DATED this 15th day of May, 2015.

s/Blake Marks-Dias
Blake Marks-Dias